

UNITED STATES DISTRICT COURT

District of Massachusetts  
1 courthouse way, suite 2300  
Boston, Massachusetts. 02210  
617-748-9152

Rashid Jahm  
Pro se  
Plaintiff

Case No:05CV11638-JLT  
Jury Trial Demanded

Vs

**Mary Kelly** Deputy County Circuit Court Clerk  
John A. Christopher  
Spitzer, Christopher & Arvanites  
Attorney for defendant  
Northwoods business Park  
199 Rosewood drive, suite 350  
Danvers, MA. 01923  
978-777-5100  
Defendant

**Plaintiff Answer to Defendant Mary Kelly Motion For Summery Judgment**

NOW COME plaintiff want to clear to defendants that they are in this federal court for Conspiracy, Fraud, Violation of due process, violation of constitutional right, and violate their oath.

This case is not about retrial this case is about defendants get together to conspire against plaintiff using their influence and their judicial power to fraud with plaintiff to deprive him for their personal gain. This case is about how the outcome was made. Following are the proof.

1. Plaintiff filed hand written paper with personally with Kelly. She charge \$20 for this filling First some other clerk was on the counter and when plaintiff said to clerk I am with drawing from my attorney and this is hand written paper I want file. The clerk asked me to wait here she went back in to Mary Kelly office and then clerk told me Mary Kelly is going to help you. I gave her that hand written paper dated **Sep. 17, 02** she read it and ask me to wait she went back to her office and then she came back and she kept one and gave me with placing stamp. That stamp was place on filed paper by plaintiff.

2. Plaintiff attorney already filed withdrawal motion because plaintiff told his attorney you can not represent me any more and you can talk with Craig Noland on my behalf that's why he filed withdrawal motion when Craig Noland found out that plaintiff has filed hand written paper with administration office for releasing his attorney. And then another motion was filed on Sep. 17, 02 proof **EXHIBIT (A) Page 1** Plaintiff substitute counsel should response to proposed Judgment. But Dennis Leiber did not give me chance to say if plaintiff wanted a substitute counsel to answer to propose judgement. **EXHIBIT (A) Page 2, Page 11, 11A**

WHEREFORE Plaintiff requests a sworn statement with proof from defendant Kelly and request to Hon. Court for relief to plaintiff from defendant and plaintiff request jury trial. So jury can decide the relief for plaintiff. And penalize the defendant in a way that it should not happen again.

Dated: March 03-06

Rashid Jahm

Pro se

49 Hallen Ave  
Lawrence, MA. 01841  
978-258-9419

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

FILE NO. 00-08794-NI

v.

HON. DENNIS B. LEIBER

CITY OF WALKER, a Michigan Municipal  
Corporation and EUGENE E. KARS.

Defendants.

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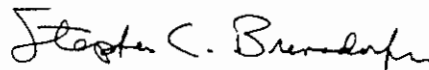
**MOTION FOR WITHDRAWAL AS  
COUNSEL FOR PLAINTIFF RASHID A. JAHM**

NOW COMES Bransdorfer & Russell, LLP, counsel of record for Plaintiff Rashid A. Jahm and moves this Honorable Court for an Order authorizing the undersigned firm to withdraw as counsel for Plaintiff Rashid A. Jahm in accordance with Rule of Professional Conduct 1.16(b)(3) and (b)(5). Upon entry of the Order terminating its representation, the undersigned firm shall take all actions necessary in accordance with Rule of Professional Conduct 1.16(D).

Respectfully Submitted,

Dated: September 17, 2002

BRANSDORFER & RUSSELL, LLP



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Stephen C. Bransdorfer (P11133)  
Suite 411-S, Waters Building  
161 Ottawa Avenue, NW  
Grand Rapids, MI 49503-2898  
(616) 774-8422

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KENT

RASHID A. JAHM,

Plaintiff,

FILE NO. 00-08794-NI

HON. DENNIS B. LEIBER

CITY OF WALKER, a Michigan Municipal  
Corporation and EUGENE E. KARS.

Defendants.

**RESPONSE TO PROPOSED  
JUDGMENT FOR DEFENDANTS**

NOW COMES Bransdorfer & Russell, LLP, and in response to the proposed Judgment forwarded to this office in accordance with MCR 2.602(B)(3), states as follows:

1. The undersigned firm has served as counsel for Plaintiff, Rashid A. Jahm, during trial of the above cause.
2. A Motion for Withdrawal by this firm as counsel for Plaintiff has been filed by the undersigned firm in accordance with Rule of Professional Conduct 1.16(b)(3) and (b)(5). It is noticed for hearing on Friday, October 4, 2002 at 8:30 a.m.
3. Accordingly, in the exercise of the Court's discretionary powers as trial judge in this matter, Plaintiff or substitute counsel should be provided the opportunity to respond to the proposed Judgment.

Respectfully Submitted,

Dated: September 17, 2002

BRANSDORFER & RUSSELL, LLP

*Stephen C. Bransdorfer*

Stephen C. Bransdorfer (P11133)  
Suite 411-S, Waters Building  
161 Ottawa Avenue, NW  
Grand Rapids, MI 49503-2898  
(616) 774-8422

(11)

State of Michigan  
The circuit court for county of Kent

Rashid A. Jahm.

Plaintiff

City of Walker, a Michigan Municipal  
Corporation and Eugene E. Kars.

file No 00-08794-N

Hon. Dennis B. Liebe

Rashid Jahm.

3009 Eastern SE Apt 303E

Grand Rapids, MI 49508

616-559-6185

Request for Retrial

firing of Attorney

Graig Noland, ROGER  
Smith, Haughey, Rice,  
Attorney for defendants

200 Calder Plaza Bldg

250 Monroe N.W.

Grand Rapids, MI 49503

616-574-8000

Dear Hon judge.

Pl due to the trust and client Attorney relation-  
ship. which was not properly informed me when. lot of paper and  
document was changing hand between Attorney. I was not consult  
and my Attorney did not ask me what I want to Explain about  
The Picture was Tamper. I was not give no chance.  
and All I was doing is crying and not able to say anything  
That why I fire ~~cancel~~ my Attorney. he will be not handling my  
Case any more from - 2-14-02 -

Dear Sir

I request to Honorable court to retrial  
of the case because of violation of civil right and

11A

04/24/2003 11:14:26  
25926

## Docket Sheet

Page: 2

## Detail

0-08794-N1 JAHM, RASHID A vs. MICHIGAN STATE POLICE et al

O.	Date of Filing	Operator	Pleadings and Actions	Journal Book-Page-Nbr	Ref Nbr	Original Amt Due/ Amt Dismissed	Balance Due
11	09/06/02	cnvKCVdk t00	Partial transcript of trial filed. ( Pages= 43, condensed ) (heard on 8/28/02) (Shawn M. Breimayer)			0.00	0.00
12	09/09/02	cnvKCVdk t00	Verdict Form filed.			0.00	0.00
13	09/09/02	cnvKCVdk t00	Record of jury trial filed. (11th day, September 9, 2002)			0.00	0.00
14	09/16/02	cnvKCVdk t00	Notice of submission of order pursuant to MCR 2.602(B)(3) and proof of service filed.			0.00	0.00
15	09/17/02	cnvKCVdk t00	Response to proposed judgment for defendants and proof of service filed. by Stephen C. Bransdorfer on behalf of Rashid A. Jahm			0.00	0.00
16	09/17/02	cnvKCVdk t00	Motion for withdrawal as counsel for plaintiff Rashid A. Jahm, notice of hearing & proof of service filed. mt fee pd. ( set for 10/4/02 @ 8:30 a.m. )			0.00	0.00
17	09/18/02	cnvKCVdk t00	Request for retrial filed.			0.00	0.00
18	09/20/02	cnvKCVdk t00	Motion for entry of judgment, notice of hearing, brief & proof of service filed. mt fee pd. ( set for 10/4/02 @ 8:30 a.m. )			0.00	0.00
19	09/23/02	cnvKCVdk t00	Notice of hearing on plaintiff's motion and objection opposing defendants' proposed judgment filed. ( set for 11/1/02 @ 1:30 p.m. )			0.00	0.00
20	09/23/02	cnvKCVdk t00	Objection, response of plaintiff motion opposing defendant's proposed judgement filed. by Rashid A. Jahm			0.00	0.00
21	10/04/02	cnvKCVdk t00	Proof of Service filed. (Order Authorizing Withdrawal of Counsel for Plaintiff Rashid A. Jahm)			0.00	0.00
22	10/04/02	cnvKCVdk	Order withdrawing counsel filed. for Jahm whose			0.00	0.00